

REPORT TO: Cabinet

MEETING DATE: 13 May 2025

BY: Executive Director for Place

SUBJECT: Homelessness Action Plan Update

1 PURPOSE

- 1.1 To update Cabinet on progress regarding the East Lothian Homelessness Action Plan 2024-26 and associated interim amendments to the Council's Housing Allocations Policy that were approved on 10 September 2024.

2 RECOMMENDATIONS

- 2.1 Cabinet is asked to approve the updated East Lothian Homelessness Action Plan.
- 2.2 Cabinet is also asked to continue to support the interim amendments to the Council's Housing Allocations Policy, to assist with identified homelessness pressures. Interim amendments will continue to be monitored closely and considered as part of a wider Housing Allocations Policy Review as identified in the LHS for 2026/27.

3 BACKGROUND

- 3.1 On 15 May 2024, the Scottish Parliament declared a national Housing Emergency¹, following five of Scotland's 32 local authorities declaring housing emergencies in their area since June 2023. This figure has since increased to 13 local authorities, with East Lothian Council declaring an 'Affordable Housing Emergency' on 12 November 2024.
- 3.2 There is no standard definition of what constitutes a housing emergency and while the reasons for this are complex and varied, common themes include pressures on homelessness services, high levels of people in temporary accommodation, significant need and demand for affordable housing, and a lack of affordable homes.

¹ [https://spice-spotlight.scot/2024/06/27/scotlands-housing-emergency/#:~:text=The%20national%20housing%20emergency%20follows,and%20Bute%20\(12%20June%202023\)](https://spice-spotlight.scot/2024/06/27/scotlands-housing-emergency/#:~:text=The%20national%20housing%20emergency%20follows,and%20Bute%20(12%20June%202023))

- 3.3 In April 2024, the Scottish Housing Regulator named eight local authorities as being at heightened risk of systemic failure regarding the delivery of homelessness services. It is recognised that some local authorities are now at, or are approaching, the limits of their capacity to do more, and the demands on some local authorities could shortly exceed their capacity to respond. East Lothian Council is one of the local authorities named, with a particular focus on high levels of breaches in respect of the Unsuitable Accommodation Order and use of temporary accommodation.
- 3.4 The Council is committed to working closely with the Scottish Government and Scottish Housing Regulator to discuss its homelessness service and monitor and assess risks, to ensure we continue to do all we can to prevent, tackle and mitigate homelessness pressures. The Action Plan prepared for 2024-2026, and approved by Cabinet in September 2024, has been updated and is attached at Appendix 1.

Council Housing Allocations Policy

- 3.5 The Council operates a Group and Points Allocations Policy, which has been operational since its introduction in July 2007. A review of the Policy took place in 2018/19 with full implementation on 1 May 2019. The Policy has been highlighted for a further review in the LHS for 2026/27.
- 3.6 The main objective of the Allocations Policy is to meet the Council's legal obligations specified in Allocations and Homelessness legislation. The policy assists the Council to make best use of Council housing stock and achieve balanced and sustainable communities via local lettings plans.
- 3.7 Notwithstanding these positive outcomes, the level of homelessness generally ²(726 homeless applications in 2024-2025 and 795 applications in 2023/24, compared with 695 in 2022/23), and associated demand for temporary accommodation, remains high.
- 3.8 Waiting times for single homeless applicants for rehousing continues to remain high, with a concomitant length of time a single homeless applicant spends in temporary accommodation³ (average length of time in temporary accommodation for single homeless households was 383 days in 2023-2024, compared with the Scottish average of 204 days).
- 3.9 To mitigate against the significant length of time single homeless households spend in temporary accommodation and homelessness pressures more generally, in September 2024 Cabinet agreed, as an interim measure, to change the bedroom entitlement for qualifying single homeless households in order that they can access two-bedroomed (3apt) properties. This would significantly increase their opportunities for an offer of permanent housing and reduce time spent in temporary accommodation.
- 3.10 To date 23 qualifying single homeless households have been offered permanent accommodation from the Council, with 17 having accepted. A

² Housing Options Team, April 2025

³ Homelessness in Scotland Report 2023-24

further 5 households have been nominated for an offer of permanent housing from our RSL partners, with 4 having accepted. All households have settled well into their permanent homes and housing staff have reported no housing management issues or concerns. All households are subject to sensitive let criteria in accordance with the existing Allocations Policy, with police checks, anti-social behaviour checks, and rent arrears checks carried out, alongside consideration of vulnerabilities.

- 3.11 Approval was also given by Cabinet in September 2024, to allow an interim measure to remove the six-month policy in terms of a homeless household's areas of choice and house types. It was considered that the previous policy position, which permitted a narrow area of choice and limited house types (i.e. double storey only in one village), delayed the applicant's opportunities for housing during this time, when homeless households should be maximising their choices. It is critical that the Council meets its statutory duties and provides permanent housing for homeless households as quickly as possible. Housing staff have reported that this is working well, and the action has enabled improved flow through the system.
- 3.12 Both interim measures received the support of the East Lothian Tenants & Resident's Panel. These measures will continue to be closely monitored and will become part of the wider Housing Allocations Policy review, where they will be subject to full public consultation.

Homeless Action Plan Update

- 3.13 The other measures in the action plan are centred around:
- Working with RSL partners to allow nomination of single households to two-bedroom properties in line with the proposed interim allocations policy changes described above – To date, discussions have taken place with two RSLs and 5 homeless households have been nominated for an offer of permanent housing.
 - Implement a programme of tenancy conversions from temporary to permanent – To date, 35 homeless households have had their temporary accommodation converted to a permanent offer since October 2023, including 3 during the period 01 October 2024 to 31 March 2025.
 - Reviewing the voids process and implementing a performance framework to reduce the relet times for our void properties
 - Reducing use of temporary accommodation generally and unsuitable accommodation specifically, whilst aiming to get homeless households into secure accommodation more swiftly and without the need to enter temporary accommodation where it can be avoided. On 31 March 2024, the Council had 211 self-contained temporary units, and this had reduced to 165 by 31 March 2025. This included a reduction of 19 units between 1 October 2024 and 31 March 2025, comprising 16 returned to RSLs and 3 conversions. Regarding emergency accommodation, the Council had circa 125 units on 31 March 2024, and this had reduced to circa 100 by 31

March 2025, including 20 units during the period 1 October 2024 to 31 March 2025.

4 POLICY IMPLICATIONS

- 4.1 The proposed Action Plan and associated amendments to the Council's Allocations Policy will assist the Council to meet its legal obligations under the Housing (Scotland) Act 2001, the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 (as amended) and the Homelessness etc. (Scotland) Act 2003.

5 INTEGRATED IMPACT ASSESSMENT

- 5.1 The subject of this report has been through the Integrated Impact Assessment process and no negative impacts have been identified.

6 RESOURCE IMPLICATIONS

- 6.1 Financial – Ongoing implementation of the Action Plan and associated changes to the Council's Allocations Policy will assist with reducing the overall financial strains on the provision of temporary accommodation, by assisting throughput of all forms of temporary accommodation to settled accommodation.
- 6.2 Personnel - None.
- 6.3 Other – None.

7 BACKGROUND PAPERS

- 7.1 None

Appendix 1: Updated Homelessness Action Plan 2024-26

AUTHOR'S NAME	Wendy McGuire
DESIGNATION	Head of Housing
CONTACT INFO	Nicky Sandford
DATE	29 April 2025

Appendix 1 – Updated Homelessness Action Plan 2024-26

Action	Baseline position	Agencies	Outcome	Timescale	Update
Change bedroom entitlement re Council's Allocations Policy for qualifying single homeless households	Bedroom entitlement as agreed 2019	Community Housing & Housing Options Team	Increase flow through housing system	Commence 01 Oct 2024 for new applicants, review Mar, 2025	23 qualifying single homeless households offered permanent accommodation, with 17 having accepted
Remove six-month policy re Council's Allocations Policy for all homeless households	Policy as agreed 2019	Community Housing & Housing Options Team	Increase flow through housing system	Commence 01 Oct 2024 for new applicants, review Mar 2025	Working well
Explore potential changes to nominations with RSL partners	Informal discussions ongoing	RSLs & Housing Options Team	Increase flow through housing system	Formal meetings held by 31 Oct 2024	Discussions with 2 RSL partners and in-principal agreement to allocate on basis of revised approach. 5 households nominated for an offer of permanent housing, with 4 having accepted
Return 15 units of temporary accommodation to RSLs	38	RSLs and Housing Options Team	Reduction in temporary accommodation stock	31 March 2025	Complete – 16 units returned to RSLs at 31 March 2025

Convert a maximum of 15 temporary accommodation units	142	Community Housing and Housing Options Team	Reduction in temporary accommodation stock	31 March 2025	Complete – 3 converted
Return 5 units of PSL temporary accommodation to private landlords	12	Housing Options Team and private landlord	Reduction in temporary accommodation stock	31 March 2025	Complete – 10 units returned (of 150 units available on 31 March 2020, 2 remain in place on 31 March 2025)
Cease use of 10 emergency accommodation units	10	Housing Options Team and providers	Reduction in temporary accommodation stock	31 March 2025	Complete – ceased use of 20 units
Roll out new case management system to Accommodation Officers		Housing Options Team	More efficient ways of working and alleviate staff pressures	31 March 2025	Complete – rolled out by 31 January 2025